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Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY; AARON WOLKIND;
STEVE HARTLEY; RICHARD SCHWETZ;
JOBEL BARBOSA; MATTHEW
REIDINGER; JOHN HUGO; SEAN-
MICHAEL DAVID SCOTT; THOMAS
LOUDEN; ZACHARY REHL; AMANDA
REHL; K.R., a minor, by and through her
father ZACHARY REHL and her mother
AMANDA REHL, MARK ANTHONY
TUCCI,

Plaintiffs,

vs.

CHRISTIAN EXOO a/k/a ANTIFASH
GORDON; ST. LAWRENCE UNIVERSITY;
TRIBUNE PUBLISHING COMPANY, LLC;
NEW YORK DAILY NEWS; VIJAYA
GADDE; TWITTER, INC; COHEN, WEISS
AND SIMON, LLP; NICK STRICKLAND;
TORCH ANTIFA NETWORK; UNNAMED
ASSOCIATES 1 – 100,

Defendants.

CIVIL ACTION NO.: 2:20-cv-12880-JMV-JSA

AFFIDAVIT OF DEFAULT

I, PATRICK TRAINOR, of full age, hereby deposes and says:

1. I am an attorney-at-law of the State of New Jersey and associated with the firm of the Law Office of Patrick Trainor, Esq., LLC, attorney for Plaintiffs in the above-entitled action.

As such, I am authorized to make the instant Affidavit on behalf of the Plaintiffs in this case.

2. On December 4, 2021, a process server, who does not have a direct interest in this litigation, acting on behalf of Plaintiff and its counsel, successfully served defendant TORCH ANTIFA NETWORK with a Summons in a Civil Action and a copy of the Verified Complaint at 383 Hillcrest Avenue, Somerset, NJ 08873. Copies of the process server's Return of Service and the Summons are attached hereto as **Exhibit A**.

3. Defendant TORCH ANTIFA NETWORK is an unincorporated association that does not have any known physical addresses or registered agents where personal service can be completed. However, the Internet Corporation for Assigned Names and Numbers ("ICANN") registry identifies One People's Project as the owner and registrant of defendant's internet domain <https://torchantifa.org>, and also the technical, administrative, and billing contact with a New Jersey mailing address. One People's Project is an approved IRS 501(c)(3) based in New Brunswick, NJ.

4. One People's Project has listed and does list 383 Hillcrest Avenue, Somerset, NJ 08873 as its business address in annual tax filings submitted to the Internal Revenue Service. Further, One People's Project's founder and only known employee, resides at 383 Hillcrest Avenue, Somerset, New Jersey 08873.

5. The time within which the said defendant may answer or otherwise move as to the Verified Complaint has expired and has not been extended or enlarged. The defendant named herein has not answered or otherwise moved or defended the action.

6. I certify under penalty of perjury that the foregoing is true and correct.



Dated: May 6, 2022

PATRICK TRAINOR